

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

H.B.,)	CIVIL ACTION FILE
)	
Plaintiff,)	NO. 1:22-cv-01181-JPB
)	
v.)	
)	
RED ROOF INNS, INC., <i>et al.</i> ,)	
)	
Defendants.)	
)	

**DEFENDANTS RED ROOF INNS, INC., FMW RRI I, LLC,
AND RRI WEST MANAGEMENT, LLC’S MOTION TO EXCLUDE
EVIDENCE OF ECONOMIC DAMAGES**

Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC (RRI Defendants) move this Court to enter an order excluding any evidence, testimony, or argument by counsel or any witness referencing or relating to economic damages at trial. Plaintiff requests only non-economic damages and there is no evidence supporting any other award. The Court should therefore grant this Motion.

A Memorandum in Support of this Motion is filed contemporaneously and incorporated fully.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella C. Ducca

Marcella C. Ducca (Ga Bar No. 115079)

Brandon D. Cox (Ga Bar No. 832025)

GREENBERG TRAURIG LLP

Terminus 200

3333 Piedmont Road NE, Suite 2500

Atlanta, GA 30305

Telephone: 678.553.2100

duccam@gtlaw.com

coxb@gtlaw.com

Chelsea R. Mikula (*pro hac vice*)

Joseph A. Manno (*pro hac vice*)

Elisabeth C. Arko (*pro hac vice*)

Emily R. Grace (*pro hac vice*)

TUCKER ELLIS LLP

950 Main Avenue, Suite 1100

Cleveland, OH 44113-7213

Telephone: 216.592.5000

Facsimile: 216.592.5009

chelsea.mikula@tuckerellis.com

joseph.manno@tuckerellis.com

elisabeth.arko@tuckerellis.com

emily.grace@tuckerellis.com

Sandra J. Wunderlich (*pro hac vice*)

TUCKER ELLIS LLP

100 South Fourth Street, Suite 600

St. Louis, MO 63102

Telephone: 314.256.2550

sandra.wunderlich@tuckerellis.com

*Attorneys for Defendants Red Roof Inns,
Inc., FMW RRI I, LLC, and RRI West
Management, LLC*

LOCAL RULE 7.1(D) CERTIFICATION

Counsel certifies that this motion has been prepared with Times New Roman size 14 pt font, which is one of the font and point selections approved by the Court in Local Rule 5.1. This motion does not contain more than 10 characters per inch of type.

Dated: October 21, 2024

Respectfully submitted,

/s/ Marcella Ducca

Marcella Ducca (Ga. Bar No. 115079)

*One of the attorneys for Defendants Red Roof
Inns, Inc., FMW RRI I, LLC, and RRI West
Management, LLC*

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 21, 2024, a copy of the above was filed with the United States District Court for the Northern District of Georgia and served on counsel of record through the Court's CM/ECF system.

Respectfully submitted,

/s/ Marcella C. Ducca
Marcella C. Ducca (Ga. Bar No. 115079)

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI I, LLC, and
RRI West Management, LLC*